

For Settlement Purposes Only – Subject to FRE 408

CLEAN AIR ACT VIOLATIONS

| Violation No. | Process Unit | Applicable Requirements | Description of Violation |
|----------------------|--|---|---|
| WM01 | 1PR brown stock washer (also referred to as the No. 1 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 17. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(iii), 63.443(c), 63.450.</p> <p><u>After 1/1/10</u> Title V permit conditions 17.5, 17.6.1 and Table 17.5, 17.17. MACT Subpart S: 40 C.F.R. §§ 63.447, 63.443(a)(1)(iii), 63.443(c), 63.450.</p> | Failure to enclose and control HVLC emissions |
| WM02 | 2PR brown stock washer (also referred to as the No. 2 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 17. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(iii), 63.443(c), 63.450.</p> <p><u>After 1/1/10</u> Title V permit conditions 17.5, 17.6.1 and Table 17.5, 17.17. MACT Subpart S: 40 C.F.R. §§ 63.447, 63.443(a)(1)(iii), 63.443(c), 63.450.</p> | Failure to enclose and control HVLC emissions |
| WM03 | 1PR brown stock washer (also referred to as the No. 1 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 17. MACT Subpart S: 40 C.F.R. §63.453(k).</p> <p><u>After 1/1/10</u> Title V Permit Condition 17.23. MACT Subpart S: 40 C.F.R. §§ 63.447, 63.453(k).</p> | Failure to Inspect/Repair Leaks |
| WM04 | 2PR brown stock washer (also referred to as the No. 2 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 17. MACT Subpart S: 40 C.F.R. §63.453(k).</p> <p><u>After 1/1/10</u> Title V Permit Condition 17.23. MACT Subpart S: 40 C.F.R. §§ 63.447, 63.453(k).</p> | Failure to Inspect/Repair Leaks |

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| WN01 | 1PR brown stock washer (also referred to as the No. 1 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 12. NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).</p> <p><u>After 1/1/10</u> Title V permit condition 13.2(a)(1). NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).</p> | TRS emissions in excess of 5 ppm |
| WN02 | 2PR brown stock washer (also referred to as the No. 2 Pre Oxygen Washer) | <p><u>Before 1/1/10</u> Title V permit condition 12. NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).</p> <p><u>After 1/1/10</u> Title V permit condition 13.2(a)(1). NSPS Subpart BB: 40 C.F.R. § 60.283(a)(1).</p> | TRS emissions in excess of 5 ppm |
| DM01 | No. 1 sawdust digester | <p><u>Before 1/1/10</u> Title V permit conditions 12.3 to 12.12, 17. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c), 63.443(d); See also Questions and Answers for the Pulp and Paper NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.</p> <p><u>After 1/1/10</u> Title V Permit Conditions 17.1, 17.2, 17.3. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c), 63.443(d); See also Questions and Answers for the Pulp and Paper NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.</p> | Failure to enclose and control LVHC emissions |
| DM02 | No. 2 sawdust digester | <p><u>Before 1/1/10</u> Title V permit condition(s) 12.3 to 12.12, 17. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c), 63.443(d); See also Questions and Answers for the Pulp and Paper NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.</p> <p><u>After 1/1/10</u> Title V Permit Conditions 17.1, 17.2, 17.3. MACT Subpart S: 40 C.F.R. §§ 63.443(a)(1)(i), 63.443(c), 63.443(d); See also Questions and Answers for the Pulp and Paper NESHAP Second Volume (40 CFR Part 63, Subpart S), pages 5-7.</p> | Failure to enclose and control LVHC emissions |